

27,080 McDonnell Douglas

September 19, 1984

Mr. J. C. Patterson, Manager Environmental Compliance Section McDonnell Douglas Corporation P. O. Box 516, Dept. 191C Hazelwood, Missouri 63166

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WASTE MANAGEMENT PROGRAM

Dear Mr. Patterson:

Enclosed is the report of compliance based upon the inspection conducted jointly August 30, 1984 by representatives of the Waste Management Program and St. Louis Regional Office, on behalf of the Missouri Department of Natural Resources. This report covers the scope of responsibility assigned to the regional office, as prepared by Mr. Joe Haake of my staff.

No problems were identified as a result of the inspection, and the facility was determined to be in compliance with all applicable requirements of the state and federal hazardous waste management laws and implementing regulations.

Thank you for the continued high level of cooperation demonstrated by your staff.

Sincerely,

Mike Duvall

Chief - Waste Management Unit St. Louis Regional Office

MD/bkl

CC: Central Office - Waste Management Program

R00144283 RCRA RECORDS CENTER



27.080
McDonnell Dougras Corporation
September 19, 1984

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

McDonnell Douglas Corporation P. O. Box 516, Dept. 191C Hazelwood, Missouri 63166 (314) 232-3319 MDNR Generator #: 01001 EPA ID #: MOD000818963 Facility Permit #: 050 062284 002

INTRODUCTION

An inspection of the McDonnell Douglas Corporation - Hazelwood complex was conducted on August 30, 1984 to assess compliance with the Part B permit conditions. The Missouri Department of Natural Resources (MDNR) was represented by Messrs. Joe Jansen and John Doyle of the Central Office - Waste Management Program (CO-WMP) and Mr. Joe Haake of the St. Louis Regional Office (SLRO). Mr. Joesph Copeland, Mr. J.C. Patterson, and Ms. Nancy Miceli of the Environmental Compliance Section represented McDonnell Douglas Corporation and accompanied the agency inspectors throughout the plant visit.

A comprehensive Part B application was submitted by McDonnell Douglas Corporation to the U.S. EPA and MDNR-WMP. On April 27, 1984, after thorough review, the draft permit was issued and on June 22, 1984 the final permit was issued. This inspection was conducted to assess compliance with the final permit conditions in order that full authorization may be granted.

UNSATISFACTORY FEATURES

None.

COMMENTS

The inspection consisted of an initial meeting with the Environmental Compliance Section representatives to discuss the basic permit conditions and any anticipated revisions. After the meeting, a physical inspection of the eleven (11) permitted treatment/storage components was conducted. Following is a brief description of each component.

- 1) Two (2) 10,000 gallon above ground tanks used to hold waste alkaline solution from aluminum chemical milling.
- 2) Five (5) 500 gallon above ground tanks used to hold waste acid solutions from titanium chemical milling.
- 3) Six (6) 750 gallon above ground tanks used to hold waste acid solution from titanium chemical milling.
- 4) A 2,000 gallon underground tank used to collect and hold waste turbine engine fuel that is spilled during fueling or defueling operations.

Christopher S. Bond Governor Fred A. Lafser Director St. Louis Regional Office

- 5) A 2,000 gallon underground tank used to collect waste turbine engine fuel and hydraulic system spillage.
- 6) A 3,000 gallon underground tank used to hold waste turbine engine fuel and hydraulic system spillage.
- 7) A 5,000 gallon underground tank used to hold jet aircraft fuels that are leaked or spilled during the testing of aircraft fuel systems.
- 8) A container storage area consisting of two (2) storage sections.
- 9) A 120,000 gallon inground open top tank used to contain waste water treatment sludge prior to dewatering.
- 10) A storage area used to contain waste ammunition and explosives.
- 11) A 1,000 gallon underground tank used to hold oil that has been separated from the condensate of an oil lubricated, steam operated compressor.

For a more detailed description of each storage/treatment component and the hazardous wastes involved, reference should be made to the Part B application and the May 2, 1984 interim status compliance inspection report.

During the plant inspection a tour of the solid waste incinerator was also conducted. The incinerator burns only solid waste generated at the Hazelwood complex. All incinerator ash and residue is transported to the Chain of Rocks Landfill on Chouteau Island in Illinois. Mr. Tom Gredell of the MDNR-WMP is presently working with McDonnell Douglas Environmental Compliance staff to finalize permit conditions for the incinerator.

All conditions of the final Part B permit appear to be met and no unsatisfactory features were noted, although final authorization must be granted by the Central Office - Waste Management Program. It is also noted that the recommendations enumerated in the May 2, 1984 interim status compliance inspection report have been implemented and the deficiencies corrected.

RECOMMENDATIONS

Continue good hazardous waste management practices in accordance with the permit requirements.

Should you have any questions concerning this report, please contact the St. Louis Regional Office.

APPROVED:

F. Donald Maddox Regional Administrator

St. Louis Regional Office

PREPARED BY:

Joe Haake

Environmental Specialist II St. Louis Regional Office

FDM/JH/bkl

CC: Central Office - Waste Management Program